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EX PARTE OR LATE FILED

**USWEST**

Cyndie Eby  
Executive Director-  
Federal Regulatory

EX PARTE

May 5, 1995

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William F. Caton, Secretary  
Federal Communications Commission  
1919 M Street, N.W., Room 222  
Washington, D.C. 20554

RE: CC Docket No. 87-579 & Rulemaking No. 8540  
Access Billing Requirements for Joint Service Provision

Dear Mr. Caton:

Today, representatives of U S WEST met with Judy Nitsche, Jim Lichford, and Katherine Schroder of the Tariff Division, Common Carrier Bureau to discuss certain points raised in U S WEST's filings in the above-referenced proceedings. U S WEST discussed the changed circumstances since the single bill requirement was adopted in 1988. With the introduction of restructured Local Transport, tandem-switched usage continues to be billed on an MOU basis and is the only portion of the local transport revenue stream that is subject to the single bill requirement. As a result of discussion at the Ordering & Billing Forum, flat rated elements are billed separately. Attached are the documents used during the discussion.

U S WEST was represented by James T. Hannon, Senior Attorney; Theresa Farmer, Exchange Carrier; and Cyndie Eby, Executive Director, Federal Regulatory.

In accordance with Section 1.1206(a)(2) of the Commission's rules, the original and one copy of this letter are being filed with your office. Please include a copy of this letter in the record in the above-referenced proceeding.

Acknowledgment and date of receipt of this submission are requested. A duplicate of this letter is included for this purpose.

Sincerely,

*Cyndie Eby*

Attachments

cc: Ms. Judy Nitsche  
Mr. Jim Lichford  
Ms. Katherine Schroder

No. of Copies rec'd 021  
List A B C D E

## 2. Interim Transport Rate Structure

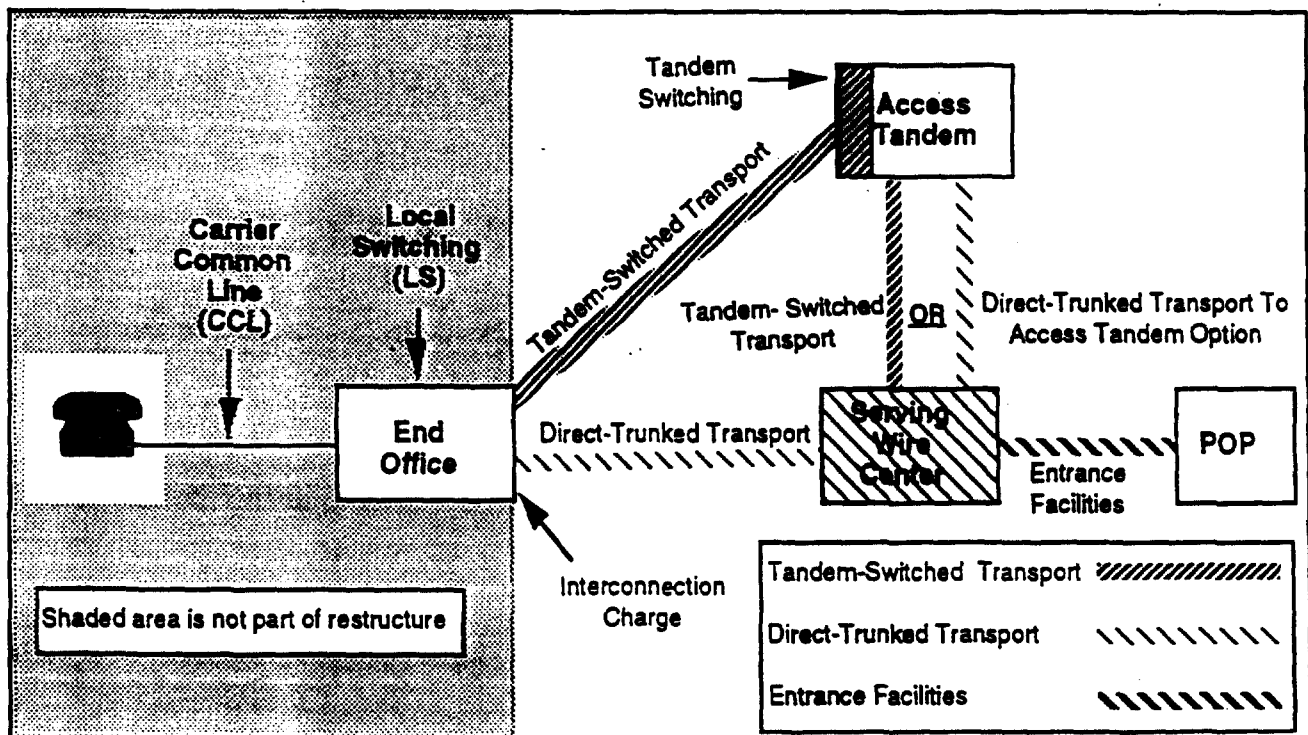
### A. General Description

The Local Transport Restructure, an FCC mandated change, reflects movement toward pricing based on the economics of the service provided. It begins to address the misallocations and subsidies that were inherent in the "equal charge rule" and is in response to changes in the marketplace, including new technologies and the growth of competition.

Switched Transport (Restructured Local Transport) is one of the Switched Access rate elements. It provides for the transmission facilities that are used to originate or terminate traffic between the Interexchange Carrier's (IC's) Point of Presence (POP) and the end user's End Office (EO).

The Switched Transport rate category is composed of four rates — Interconnection Charge, Entrance Facility, Direct Trunked Transport, and Tandem Switched Transport (Tandem Switched Transport is the summation of two elements, (1) Tandem Transmission and (2) Tandem Switching).

### FCC DOCKET 91-213: INTERIM RATE STRUCTURE



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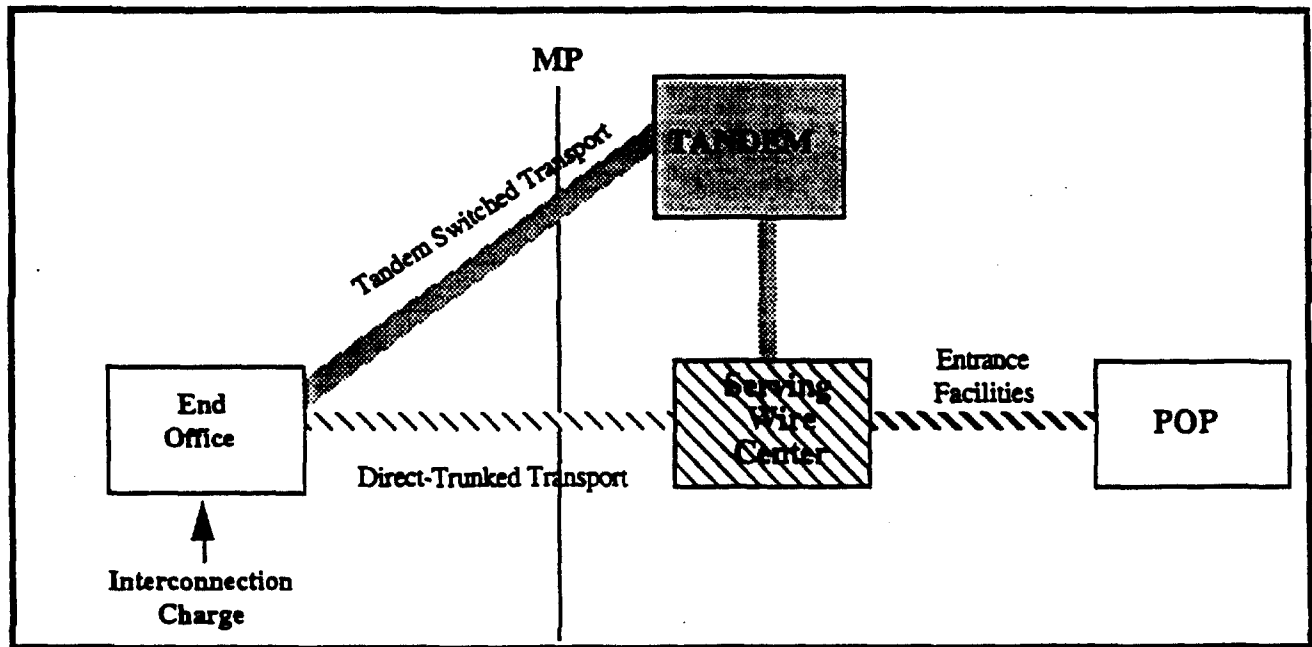
Revised January 21, 1994

## E. Meet Point Billing (MPB)

USWC jointly provides service with other Local Exchange Carriers (LECs). When this occurs, transport service is meet point billed. USWC is required to implement LTR, whereas non-Tier 1 LECs are exempt from LTR unless they receive a "bona fide" customer request for DTT. As a result, jointly provided services could be billed by the other LEC in two different ways:

- Switched transport billed under LTR
- Switched transport billed as "equal charge" Local Transport

The diagram illustrates a typical meet point billing situation, with the corresponding applicable rate elements.



**Both LECs Under LTR**

Rates assessed by the End Office Company:

- 100% Interconnection Charge\*
- Tandem Transmission (End Office to the Meet Point)\*
- Direct Trunked Transport (End Office to the Meet Point)

Rates assessed by the POP Company:

- 100% Entrance Facilities
- Tandem Transmission (SWC to the Meet Point)\*
- 100% Tandem Switching\*
- Direct Trunked Transport (SWC to the Meet Point)

### Other LEC Under "Equal Charge": USWC Under LTR

Rates assessed by the End Office Company:

- Local Transport (End Office to the Meet Point)\*

Rates assessed by the POP Company:

- 100% Entrance Facilities
- Tandem Transmission (SWC to the Meet Point)\*
- 100% Tandem Switching\*
- Direct Trunked Transport (SWC to the Meet Point)

Note: If Single Bill arrangement exists the \* represents the elements billed under that agreement.

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Revised January 21, 1994

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